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July 11, 1996

Molly Hall, Esquire
Environmental Enforcement Section
U.S. Department of Justice
P.O. Box 7611
Ben Franklin Station
Washington, DC 20530

RE: <u>United States of America v. Keystone Sanitation Company, Inc., et al.</u>
Allen's Kartway

Dear Ms. Hall:

This is in response to your correspondence dated April 30, 1996 requesting additional information with regard to the de micromis eligibility of the above-referenced Fourth-Party Defendants in the Keystone Sanitation litigation.

Allen's Kartway - go-kart rental track

Mr. Allen's father started the go-kart track in 1979. Mr. Allen began to run the business in approximately 1988. The parts cleaning tank was already in place and used solvents were being removed by Safety-Kleen at the time Mr. Allen began to run the business. Mr. Allen's father died in approximately 1984. Mr. Allen's brother, Joe Allen, recalls their father purchasing the parts cleaning tank and using Safety-Kleen sometime prior to his death in 1984. Due to the fact that Mr. Allen's father has died, we are unable to determine the exact date when the parts cleaning tank was purchased and installed; other than that it was sometime prior to 1984.

Molly Hall, Esquire July 11, 1996 Page 2 Molly Hall, Esquire July 11, 1996 Page 3

We hope this provides you with all of the information you need to continue your evaluation of the above-referenced Fourth-Party Defendants' eligibility for settlement with the government in this matter.

Should you have any additional questions in regard to the foregoing, please do not hesitate to contact the undersigned.

Very truly yours,

Robyn J. Katzman

RJK/ajs

cc: Mr. Robert Allen

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